

MUR # 7966OFFICE OF
GENERAL COUNSEL

Lisa J. Stevenson
Acting General Counsel
Office of the General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

2022 MAR -2 PM 12: 13

Dear Ms. Stevenson,

I hereby file this complaint under 52 U.S.C. 30109(a)(1) against Charles Lutin and the Committee to Elect Lutin for Congress (the "Committee"), for violating the Federal Campaign Act of 1971, as amended (the "Act"), and the Federal Election Commission (the "FEC") regulations, as described below. A cursory review of Committee's Year-End 2021 report shows numerous omissions of required information in violation of the Act. The FEC should open an investigation into the Committee's raising and spending to ensure that all receipts were from permissible sources and to further the FEC's public disclosure mission.

Count 1 – Failure to Report Identity of Contributors.

The Act and Commission regulations require political committees to disclose certain information, including the name, address, occupation, and employer for each individual whose aggregate contributions exceed \$200 in an election cycle. House and Senate committees report contributions received from individuals on Form 3, Line 11(a).

Instead of reporting the identities of the contributions the Committee has received, the Committee hid that information from public view. In fact, the Committee's 2021 report does not disclose the identity of a single contributor. This is a serious violation of the most basic requirements of a campaign committee, and calls into question the candidate's fitness for office.

Count 2 – Failure to Report Disbursements

Candidate committees are also required to disclose the name and address of the payee for all disbursements. In its Year-End 2021 report, the Committee did not disclose the identity of a single disbursement payee, instead reporting itself as the payee of all disbursements. This is a violation of the Act, and subverts the Commission's mission of public disclosure.

Count 3 – Violation of Petty Cash Spending Limit.

The Act and Commission regulations permit a political committee to maintain a petty cash fund, but cash expenditures may not exceed \$100. See 11 C.F.R. § 102.11. The Committee's Year-End 2021 report discloses a bulk petty cash payment to an unnamed recipient for \$642.25. The Commission should open an investigation into the Committee's cash spending to ensure that the funds were not used for impermissible purposes.

Conclusion

The FEC serves an important role in regulating the raising and spending of funds in federal elections. It also provides important information to the public about a political committee's raising and spending. Here, the Committee has completely ignored its responsibilities to properly disclose its financial activity. The Commission should open an investigation into the Committee to ensure that it follows the law.

Respectfully submitted,

Full Name

William G. Buoni Jr.

Address

LaFayette, GA 30728



State of Georgia

County of Walker

The foregoing was signed and sworn before me under penalty of perjury on this 25 day of Feb 2022.

Notary Public Signature



My Commission Expires (Date) 02/03/2024

